

December 1, 2021

**SEALED**

UNITED STATES DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS  
 SAN ANTONIO DIVISION

CLERK, U.S. DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS  
 By: SAJ  
 Deputy

UNITED STATES OF AMERICA

Plaintiff

v.

- (1) TIMOTHY BLAND  
     aka "GRANDMA"
- (2) CRANDALL JONES  
     aka "PUNIE"
- (3) LUIS TOVIAS
- (4) VALERIE NICHOLE GARCIA
- (5) PAMELA FELITA BREEDING
- (6) TIMOTHY ELVIN BREEDING  
     aka "LITTLE TIM"  
     aka "LITTLE T"  
     aka "JUNIOR"
- (7) JOHN RUSSUP  
     aka "PIZZA"  
     aka "PIZZA MAN"
- (8) MICHELLE KATHERINE BILSKY  
     aka "KAT"
- (9) TERRY LYNN CLAY
- (10) TONYA VONCI MIDDLETON-  
     HARRIS
- (11) DANA HARRINGTON
- (12) LAMONDRAE IRVING

Defendants

**Case No: SA-21-CR-00531-JKP****INDICTMENT**

- COUNT 1:** Vio: 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)/(B) and 846: Conspiracy to Possess With Intent to Distribute Methamphetamine
- COUNT 2:** Vio: 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B): Possession With Intent to Distribute 50 grams or more of Methamphetamine
- COUNT 3:** Vio: 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B): Possession With Intent to Distribute 50 grams or more of Methamphetamine

THE GRAND JURY CHARGES:

**COUNT ONE**

[21 U.S.C. §§ 841(a)(1) &amp; (b)(1)(A)/(B) and 846]

Beginning on or about January 12, 2021, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

- (1) TIMOTHY BLAND aka "GRANDMA"
- (2) CRANDALL JONES aka "PUNIE"
- (3) LUIS TOVIAS
- (4) VALERIE NICHOLE GARCIA
- (5) PAMELA FELITA BREEDING
- (6) TIMOTHY ELVIN BREEDING aka "LITTLE TIM" aka "LITTLE T" aka "JUNIOR"
- (7) JOHN RUSSUP aka "PIZZA" aka "PIZZA MAN"
- (8) MICHELLE KATHERINE BILSKY aka "KAT"
- (9) TERRY LYNN CLAY
- (10) TONYA VONCI MIDDLETON-HARRIS
- (11) DANA HARRINGTON
- (12) LAMONDRAE IRVING

knowingly and intentionally conspired, combined, confederated and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved methamphetamine, a Schedule II Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B) and 846.

**QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY**

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
Timothy Bland (1)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Crandall Jones (2)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
Luis Tovias (3)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Valerie Nichole Garcia (4)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine

Pamela Felita Breeding (5)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Timothy Elvin Breeding (6)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
John Russup (7)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Michelle Katherine Bilskey (8)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Terry Lynn Clay (9)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Tonya Vonci Middleton-Harris (10)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Dana Harrington (11)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine
Lamondrae Irving (12)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine

COUNT TWO

[21 U.S.C. §§ 841(a)(1) &amp; (b)(1)(B)]

That on or about January 12, 2021, in the Western District of Texas, Defendant,

(7) JOHN RUSSUP aka “PIZZA” aka “PIZZA MAN”

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of a mixture or substance containing Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(B).

COUNT THREE

[21 U.S.C. §§ 841(a)(1) &amp; (b)(1)(B)]

That on or about February 24, 2021, in the Western District of Texas, Defendants,

(7) JOHN RUSSUP aka "PIZZA" aka "PIZZA MAN"  
(12) LAMONDRAE IRVING

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of a mixture or substance containing Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(B).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
[See Fed. R. Crim. P. 32.2]

**I.**

**Drug Violations and Forfeiture Statutes**

**[Title 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A) and (b)(1)(B), subject to forfeiture pursuant to Title 21 U.S.C. § 853(a)(1) and (2)]**

As a result of the criminal violations set forth in Count One through Three, the United States gives notice to the Defendants of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. § 853(a)(1) and (2), which states:

**Title 21 U.S.C. § 853. Criminal forfeitures**

**(a) Property subject to criminal forfeitures.**

Any person convicted of a violation of this subchapter or subchapter II punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law.--

- (1)** any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2)** any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; . . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties:

**Real Properties**

1. Real Property located and situated at **3527 Tampa St., Houston, Harris County, Texas**, with all buildings, appurtenances, and improvements thereon and any and all surface and sub-surface rights, title, and interests, if any, and being more fully described as follows:

Lot 20, Block 1 of Terrace Oaks, an Addition in Harris County, Texas according to the map or plat thereof, recorded in Volume 25, Page 24 of the Map Records of Harris County, Texas.

A TRUE BILL.

[REDACTED]

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF

United States Attorney

By: \_\_\_\_\_

For SARAH ELLA SPEARS

Assistant United States Attorney

